

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

CC HOLDINGS, LLC,)	
CC BRIARCLIFF, LLC,)	
CONTINUUM COURTYARDS, LLC,)	
AND COURTYARDS BRIARCLIFF, LLC,)	Docket No. 3:16-CV-00561
)	Judge Greer
Plaintiffs/Counter-Defendants,)	Magistrate Judge Shirley
)	
)	
v.)	
)	
EAST LAKE ACQUISITION COMPANY IV, LLC,)	
)	
Defendant/Counter-Plaintiff.)	

**JOINT MOTION FOR
AGREED PROTECTIVE ORDER**

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, the parties hereby jointly move for entry of an agreed protective order (the “Motion”). As grounds for the Motion, the parties state:

- 1) The parties are engaged in written discovery.
- 2) In the course of written discovery, the parties will produce and/or exchange documents that contain and/or are likely to contain confidential personal and proprietary commercial information including, but not limited to, wage and benefit records, client resident contracts and financial information, financial statements and other private financial and business information (the “Confidential Documents and Information”).

3) The parties have agreed that a protective order is appropriate to preserve the confidentiality of the Confidential Documents and Information and to limit their disclosure to third parties.

4) The parties have negotiated and agreed upon a proposed Agreed Protective Order submitted contemporaneously herewith.

5) The Agree Protective Order as proposed by the parties does not allow for the presumptive filing of documents under seal but rather requires the filing of an additional motion consistent with Rule 26.2(b) of the Local Rules setting forth the specifics as to why any particular document or group of documents should be filed under seal.

6) As set forth above, good cause exists for the entry of the proposed Agreed Protective Order.

Wherefore, the parties jointly request that the Court enter the proposed Agreed Protective Order.

Pursuant to ECF Rule 6 of the U.S. District Court for the Eastern District of Tennessee, the Filing User hereby represents that all signatories have consented to the filing of this document.

RESPECTFULLY SUBMITTED:

/s Daryl R. Fansler by T Parham, w/permission
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the Court's electronic filing system upon the following:

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This 9th day of May, 2017.

s/W. Travis Parham